

CHAPTER 7

TRAINING REQUIREMENTSA. STATUTORY TRAINING REQUIREMENTS

The Privacy Act (reference (b)) requires each agency to establish rules of conduct for all persons involved in the design, development, operation, and maintenance of any system of record and to train these persons with respect to these rules.

B. OMB TRAINING GUIDELINES

The OMB guidelines require all agencies additionally to:

1. Instruct their personnel in their rules of conduct and other rules and procedures adopted in implementing the Act, and inform their **personnel** of the penalties for noncompliance.

2. Incorporate training on the special requirements of the Act into both formal and informal (on-the-job) training programs.

C. DoD TRAINING PROGRAMS

1. To meet these training requirements, establish three general levels of training for those persons who are involved in any way with the design, development, operation, or maintenance of **any** system of records. These are:

a. Orientation. Training that provides basic understanding of this Regulation as it applies to the individual's job performance. This training shall be provided to personnel, as appropriate, and should be a prerequisite to all other levels of training.

b. Specialized training. Training that provides information as to the application of specific provisions of this Regulation to specialized areas of job performance. Personnel of particular concern include, but are not limited to **personnel** specialists, finance officers, special investigators, paperwork managers, and other specialists (reports, forms, records, and related functions), computer systems development personnel, *computer systems operations personnel*, statisticians dealing with personal data and program evaluations, and anyone responsible for implementing or carrying out functions under this Regulation.

c. Management. Training designed to identify for responsible managers (such as, senior system managers, denial authorities, decision-makers, and the managers of the functions described in section A. of this Chapter) considerations that they shall take into account when making management decisions regarding the Privacy Program.

2. Include Privacy Act training in courses of training when appropriate. Stress individual responsibilities and advise individuals of their rights and responsibilities under this Regulation.

D. TRAINING METHODOLOGY AND PROCEDURES

1. Each DoD Component is responsible for the development of training procedures and methodology.

2. The Defense Privacy Office will assist the Components in developing these training programs and may develop Privacy training programs for use by all DoD Components.

3. All training programs shall be coordinated with the Defense Privacy Office to avoid duplication and to ensure maximum effectiveness.

E. FUNDING FOR TRAINING

Each DoD Component shall fund its own Privacy training program.